

REVIEW OF PESTICIDE REGISTRATIONS
PURSUANT TO FIFRA § 3(g)

DISCUSSION DRAFT

Prepared for PPDC Work Group on Registration Review Program

Introduction

FIFRA section 3(g) states, “The registrations of pesticides are to be periodically reviewed. The Administrator shall by regulation establish a procedure for the periodic review of registrations. The goal of these regulations shall be a review of a pesticide’s registration every 15 years.”

Based on the statutory provision, some members of the PPDC RRWG recommended using 15 years from the date of the last major regulatory action on a pesticide registration as the initial selection criterion, with further refinement based on additional criteria.

Several other RRWG members suggesting using risk considerations as the primary criterion for assigning priority within the group of pesticide registrations scheduled to be reviewed within a 15-year period. The universe for this initial group would be all post-1984 active ingredient registrations. Tiers, based on criteria related to risk, would be used to assign review priority. Other members suggested a hybrid approach.

Following is a proposal for defining the scope of registration review. Cindy Baker volunteered to draft this proposal for the work group to review before presenting it to the full PPDC. This draft takes into consideration what the statute says, EPA resources and existing programs that already address registration, reregistration or other activities. This proposal only deals with scope not process questions like “early off ramp”, tiering the process, priorities, etc. those should be addressed when a process is discussed.

Draft Proposal

- I. Identify review candidates – EPA should inventory all pesticide registrations and add a field to their database where they can identify the date of the last registration action on that registration. All pesticide registrations should be reviewed to ensure they meet the requirements for registration. Congress’ language refers specifically to the singular pesticide. This means the review of an individual pesticide. Registration Review does not include inerts as they are not pesticide registrations. While it may be helpful for the Agency to group by active ingredient or common mechanism, they should start with a list of pesticide registrations.
- II. Registration Review Requirements – the “registration review” of a pesticide registration very simply should be evaluating the pesticide registration to ensure it meets the requirements of registration at the time the registration review is conducted. Registration review includes all Section 3 and Section 24© registrations. Registration Review is not tolerance reassessment. Special Review and Reregistration already has and will continue to have authority and jurisdiction to conduct their reviews that work should not be duplicated in a registration review process. EPA should have a formally adopted set of registration requirements that are clearly articulated in FIFRA. The registration review process will be to see if the pesticide registration meets those requirements. It is not a vehicle for significant additional generic data requirements to be proposed those should be addressed through updates to Part 158. Once EPA has reviewed a pesticide registration they send a letter to the registrant(s) that states any one or combination of the following: 1) the product has been reviewed and is eligible to remain registered. 2) Registration review indicates the need for additional data to address deficiencies in the database. 3) There are modifications that must be made to the label for it to remain. At the conclusion of any of these actions the 15-year clock is restarted.